

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

MOTORS LIQUIDATION COMPANY, *et al.*
f/k/a General Motors Corp., *et al.*

Debtors.

MCM MANAGEMENT CORP.,

Plaintiff,

vs.

MANUAL TRANSMISSIONS OF
MUNCIE, LLC, THE STATE OF INDIANA
and the TREASURER OF DELAWARE
COUNTY, INDIANA

Defendants.

Case No. 09-50026-REG

(United States Bankruptcy Court
Southern District of New York)
Chapter 11 (Jointly Administered)

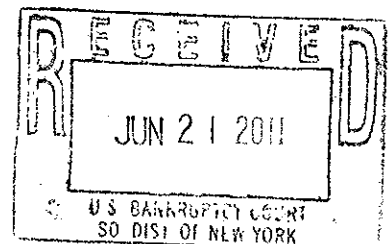
Adv. Pro. No. 10-56003

MOTION FOR LEAVE TO WITHDRAW APPEARANCE

James A. Federoff and Jason M. Kuchmay, of the law firm Federoff Kuchmay LLP, pursuant to Local Bankruptcy Rule 2090-1, respectfully move the Court to enter an order withdrawing their Appearance on behalf of MCM Management Corp. and, in support, submit the following as cause:

1. James A. Federoff and Jason M. Kuchmay are licensed to practice law in the State of Indiana and were retained by MCM Management Corp. ("MCM") to pursue an action against Manual Transmissions of Muncie, LLC ("MTM") in Indiana.

2. On behalf of MCM, James A. Federoff and Jason M. Kuchmay initiated a lawsuit against MTM in the Delaware Circuit Court, in the State of Indiana.



3. That action was later removed to the United States Bankruptcy Court for the Southern District of Indiana, which Court then transferred the case to the United States Bankruptcy Court for the Southern District of New York.

4. Neither James A. Federoff nor Jason M. Kuchmay are admitted to practice in the State of New York, and they have not moved for admission *pro hac vice*.

5. On October 26, 2010, Jason M. Kuchmay advised Thomas E. Coughlin, Esq., an attorney with the Michigan law firm of Jaffe, Raitt, Heuer & Weiss, P.C., that it would be necessary for another attorney to appear in the case since it was transferred to New York.

6. Jaffe, Raitt, Heuer & Weiss, P.C. is general counsel for MCM.

7. On December 2, 2010, R. Christopher Cataldo, Esq. ("Cataldo"), an attorney with Jaffe, Raitt, Heuer & Weiss, P.C., appeared in this case and filed a Motion for Admission to Practice, *Pro Hac Vice*.

8. This Court's inline docket reflects that MCM is represented by Cataldo.

9. As the result of Cataldo's appearance, and because James A. Federoff and Jason M. Kuchmay are not licensed to practice in the State of New York, good cause exists for the withdrawal of their Appearance in this transferred action.

WHEREFORE, James A. Federoff and Jason M. Kuchmay, of the law firm Federoff Kuchmay LLP, respectfully move the Court to enter an Order withdrawing their Appearance on behalf of MCM, and that of their firm, and providing all other just and proper relief.

Respectfully submitted,

FEDEROFF KUCHMAY LLP

/s/ Jason M. Kuchmay

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the following either electronically or via first class United States mail, postage prepaid and addressed as shown, this 16th day of June, 2011:

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/s/ Jason M. Kuchmay
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